

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

J. MICHAEL CHARLES; MAURICE W.	)	C. A. NO. 05-702 (SLR)
WARD, JR.; and JOSEPH I. FINK, JR., on	)	(Lead Case)
behalf of themselves and all others similarly	)	
situated,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
PEPCO HOLDINGS, INC; CONECTIV, and	)	
PEPCO HOLDINGS RETIREMENT PLAN,	)	
	)	
Defendants.	)	

PLAINTIFFS' MOTION FOR  
APPOINTMENT OF INTERIM CLASS COUNSEL

Plaintiffs J. Michael Charles, Maurice W. Ward, Jr., Joseph I. Fink, Jr., and Thomas S. Troup hereby move this Court, pursuant to Rule 23(g)(2)(A) of the Federal Rules of Civil Procedure, for an Order appointing Chimicles & Tikellis LLP as interim class counsel. The reasons why this relief should be granted are set forth in the accompanying brief.

Dated: August 15, 2006

**CHIMICLES & TIKELLIS LLP**

/s/ A. Zachary Naylor

Pamela S. Tikellis (#2172)  
Robert J. Kriner (#2546)  
A. Zachary Naylor (#4439)  
One Rodney Square  
P.O. Box 1035  
Wilmington, DE 19899  
302-656-2500 (telephone)  
302-656-9053 (fax)

and

**CHIMICLES & TIKELLIS LLP**

James R. Malone, Jr.

*(pro hac vice)*

Joseph G. Sauder

*(pro hac vice)*

One Haverford Centre

361 West Lancaster Avenue

Haverford, PA 19041

610-642-8500 (telephone)

610-649-3633 (fax)

Attorneys for Plaintiffs

**RULE 7.1.1 CERTIFICATE**

I hereby certify that the subject of Plaintiffs' Motion for Appointment of Interim Class Counsel has been raised by plaintiffs' counsel with counsel for the defendants. Plaintiffs counsel has been advised that the defendants will oppose the motion.

Dated: August 14, 2006

CHIMICLES & TIKELLIS LLP

/s/ A. Zachary Naylor  
A. Zachary Naylor (No. 4439)